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*Attorneys for Defendants the Reed  
Group, LLC, Stacey Grace, and Peter  
B. Nagel, Trustee of the Presley Reed  
1999 Family Trust*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KENNETH F. PHILLIPS,

Plaintiff,

v.

REED GROUP, LLC, STACEY GRACE, PRESLEY  
REED, PETER B. NAGEL, as Trustee of the Presley  
Reed 1999 Family Trust

Defendants.  
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: Case No. 07 CV 3417 (DAB)  
:

: **NOTICE OF MOTION FOR AN**  
: **ORDER DIRECTING PLAINTIFF**  
: **TO FILE A COMPLAINT AND**  
: **EXTENDING DEFENDANTS'**  
: **TIME TO ANSWER OR**  
: **OTHERWISE RESPOND**  
:

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying declaration of Rachel Izower, defendants Reed Group, LLC, Stacey Grace and Peter B. Nagel, as Trustee of the Presley Reed 1999 Family Trust (together "Defendants") will move this Court before the Honorable Deborah A. Batts, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order directing Plaintiff Kenneth F. Phillips to file a complaint in the above-captioned action and enlarging Defendants' time to answer or otherwise respond until 30 days after the complaint is served upon each.

Dated: New York, New York  
May 7, 2007

GREENBERG TRAURIG LLP

By: 

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LLC, Stacey Grace, and Peter B. Nagel,  
Trustee of the Presley Reed 1999 Family Trust

TO: Kenneth F. Phillips  
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Plaintiff  
By Federal Express and U.S. Mail